

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

RAS Citron, LLC

Authorized Agent for Secured Creditor
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
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Laura Egerman, Esq. (LE-8250)

In Re:

Adam Timothy Marchick,

Debtor.

Case No.: 19-14180-JKS

Chapter: 7

Hearing Date: April 9, 2019

Judge: John K. Sherwood

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

HEARING DATE AND TIME:
April 9, 2019 at 10:00AM

**ORAL ARGUMENT IS REQUESTED IN THE EVENT
OPPOSITION IS TIMELY FILED**

TO:

<i>Debtor-</i>	<i>Debtor's Attorney-</i>	<i>Trustee-</i>	<i>U.S. Trustee-</i>
Adam Timothy Marchick 24 Oak Street - Apt. 2B Hackensack, NJ 07601	John F. Murano Murano & Roth, LLC 800 Kinderkamack Rd Suite 202N Oradell, NJ 07649	Steven P. Kartzman Mellinger, Sanders & Kartzman LLC 101 Gibraltar Dr. Suite 2F Morris Plains, NJ 07950	US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102

PLEASE TAKE NOTICE that on April 9, 2019, at 10:00a.m., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for USAA FEDERAL SAVINGS BANK, the within creditor ("Creditor"), shall move before the Honorable Judge John K. Sherwood, United States Bankruptcy Judge, at 50 Walnut Street, 3rd Floor Newark, N.J. 07102 Courtroom 3D, for an Order pursuant to 11 U.S.C. §362(d)(1) and 11 U.S.C. § 1301 granting such Creditor relief from

automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Martin Luther King, Jr. Federal Building 50 Walnut Street Newark, NJ 07102**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202 Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: March 15, 2019

RAS Citron, LLC
130 Clinton Road, Lobby B, Suite 202
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Telephone: 973-575-0707
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By: /s/ Laura Egerman
Laura Egerman, Esquire
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